

EXHIBIT D
STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD
AFFIDAVIT

STATE OF IOWA)
)**SS:**
COUNTY OF LINN)

I, Joe Berry, being first duly sworn on oath do hereby depose and state that I am employed by ITC Midwest LLC (“ITC Midwest”) as a Senior Transmission Planning Engineer, and my business address is 6750 Chavenelle Road, Dubuque, Iowa 52002.

I do further state that ITC Midwest holds itself out to serve all applicants for its service pursuant to its rules, regulations, and rates in the urban and rural areas within which it is franchised and operates.

ITC Midwest is subject to the jurisdiction of the Utilities Division of the Iowa Department of Commerce over the issuance, extension, and amendment of electric transmission line franchises and its rules and regulations concerning the safety of its customers, employees, and the public.

I do hereby state and affirm that this Petition requests an Amendment of Franchise to rebuild a 36,230V maximum (34,500V nominal) electric transmission line, with mileage as indicated in the Petition, to 72,500V maximum (69,000V nominal) electric transmission line standards in Linn County, Iowa. Construction to 69,000V nominal standards is in preparation for future operation at 69,000V nominal voltage. Initial operation after rebuild will be at 34,500V nominal voltage. Operation at 69,000V nominal voltage will not occur until all distribution substations have made the necessary changes to accommodate the conversion. This is expected to occur in two to three years. The transmission line will be located primarily in private right of way in Linn County, Iowa, as described in Exhibit A, shown upon the route map designated as Exhibit B, and constructed in general accordance with the Typical Engineering Specifications designated as Exhibit C, all of which are attached hereto and made a part hereof. The line within this petition has been previously franchised as follows:

Docket:	E-20994
Franchise No.:	16945
County:	Linn
Issued:	July 19, 1996
Granted to:	IES Utilities, Inc.

The rebuilt line is necessary to serve a public use by better serving current and future load

in Linn County. This transmission line is being built as part of a comprehensive plan to upgrade the outdated 34.5 kV nominal transmission system to a modern 69 kV nominal transmission system to better serve area load during normal and contingency operation. Generally, the 34.5 kV transmission system is in poor physical condition due to its age and no longer has the capacity to maintain acceptable loading and voltage levels during contingencies. Also, the addition of new load to the 34.5 kV system will make it more difficult to operate the system in a reliable manner due to its limited capability. Upgrading the transmission system to 69 kV standards increases the system's resistance to lightning-related outages due to increased insulation levels and the addition of a static wire at the top of structures. Converting to 69 kV operation doubles the capacity of a given conductor size and reduces voltage drop along the length of a line, thereby providing the ability to serve more load while maintaining acceptable normal and contingency voltage and loading levels. In addition, operation at 69 kV provides the ability to more easily operate in a networked configuration because it is easier to design an adequate protection system. Operating in a network configuration makes the overall system more capable of continued operation after the outage of a line segment due to the fact that system voltage is generally maintained at a higher level and alternate flow paths for power to reach loads are provided.

ITC Midwest further alleges that the proposed construction represents a reasonable relationship to an overall plan of transmitting electricity in the public interest in Linn County, as follows:

(1) The relationship to present and future economic development of the area:

If approved, the proposed amendment to the franchise and the resulting upgrade is believed to be adequate to serve present and most future economic development in the area based on known information.

(2) The relationship to comprehensive electric utility planning:

The upgraded line is part of a comprehensive electric utility plan to upgrade the outdated 34,500V nominal voltage, radially operated, transmission system in Iowa to a modern, network operated, 69,000V nominal voltage transmission system. The line is a segment of a longer 69 kV line that provides a connection between ITC Midwest's Mt. Vernon Substation, located in Section 25, Township 83 North, Range 5 West of Linn County, and Prairie Creek Industrial Substations, located in Section 3, Township 82 North, Range 7 West of Linn County. Both the Mt. Vernon and Prairie Creek Industrial Substations are primarily served by the 161 kV system via 161/69 kV transformers that will serve the 69 kV system. The Mt. Vernon to Prairie Creek Industrial 69 kV transmission line will serve five (5) distribution substations located in Linn County that serves residential, commercial, and industrial customers.

(3) The relationship to the needs of the public presently served and future projections based on population trends:

The upgraded line will have the required transmission capacity to reliably serve the needs of the public presently served by the line and future projections based on population trends. When considering expected load growth, loading on this line will remain within ITC Midwest planning standard requirements.

(4) The relationship to the existing electric system and parallel existing utility routes:

The line interconnects with existing electric utility systems in Linn County and has three phase distribution lines routed parallel to the upgraded line. These distribution lines will be relocated to the new transmission line poles during construction. The upgraded line will also parallel ITC Midwest's existing Prairie Creek Industrial to Bertram 161 kV transmission line.

(5) The relationship to any other power system planned for the future:

Currently, ITC Midwest plans to build a new 69,000V nominal transmission line from the Mt. Vernon Substation east to the Traver Distribution Substation tap. This new line is expected to be constructed and placed in service in two to three years and will complete the circuit between the Mt. Vernon and Prairie Creek Industrial Substations at which time 69,000V nominal operation can occur.

(6) Possible use of alternative routes and methods of supply:

The proposed line re-construction will primarily follow the same route as the line it is replacing with the same land rights as before with the exceptions as follows: After a patrol and survey of the existing route, it was determined by ITC Midwest's design department that the existing route was sufficient to accommodate the rebuilt transmission line but additional tree trimming rights would be needed for one route mile or more. As such, the route and method of supply as described in this petition are believed to be the most practical and reasonable. All other alternative routes would be less practical and reasonable given that the endpoints of the line are not changing, and this route, with modifications as indicated, has been determined to be sufficient.

(7) The relationship to the present and future land use and zoning ordinances:

This construction is believed to be consistent with present and future land use. Based upon information available to it at the time of this filing, ITC Midwest does not anticipate that there will be any future ordinances which may affect the line.

(8) The inconvenience or undue injury which may result to property owners:

ITC Midwest does not expect property owners to be inconvenienced or injured as a result of the rebuilt line. This rebuild will be constructed primarily in private right-of-way. ITC Midwest will require new or additional interests in real property for one route mile or more and, as such, an informational meeting has

been conducted consistent with 199 IAC 11.4(5). The line will be constructed in accordance with the National Electrical Safety Code as well as the Iowa Electrical Safety Code requirements as referenced in 199 IAC 11.1(3) and 199 IAC 25 to ensure safe clearances for the protection of property owners.

Done at Dubuque, Iowa, this 1st day of August, 2016.

/s/ Joe Berry
Joe Berry
Senior Transmission Planning Engineer

Subscribed and sworn to before me by Joe Berry, Senior Transmission Planning Engineer, this 1st day of August, 2016.

/s/ Julie A. Ernst
Julie A. Ernst – Notary Public
Commission Expires: 12/8/2017